

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

UNITED STATES OF AMERICA, Criminal Number 21-20421

Plaintiff,

Hon. David M. Lawson

v.

D-1 Robert Lampkin,

Defendant.

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**Government's Sentencing Memorandum and Motion for  
Downward Departure**

Robert Lampkin conspired to possess with intent to distribute a controlled substance. Specifically, on a weekend in April 2021, he conspired to transport from LAX (Los Angeles) airport to DTW (Detroit) airport a quantity of methamphetamine that was at least 180x the amount that triggers the largest mandatory minimum sentence in 21 U.S.C. § 841(b)(1)(A)(viii). His relevant drug distribution conduct, however, extended well beyond that weekend. And unlike Lampkin's codefendants, he was the leader, who enticed and enlisted vulnerable and/or young people in his drug trafficking conspiracy.

Separately, Lampkin conspired to commit unemployment insurance fraud, which in aggregate defrauded state unemployment programs out of \$2,143,875.

Lampkin's harmful conduct (drug distribution and unemployment insurance fraud) is mitigated, slightly, by his limited criminal history. The government submits that, for the reasons provided below, a sentence 204-months (17-years) is sufficient, but not greater than necessary, to achieve the purposes set forth in 18 U.S.C. § 3553(a)(2).

## **I. Factual Background**

### *Drug Distribution: April 21-24, 2021*

On or about April 21, 2021 through April 24, 2021, Lampkin, D-2 Brenden Lockridge, D-3 JoShawn Bennett, D-4 Tiffany Stockman, and D-5 Tammie Wade conspired to possess with intent to distribute a controlled substance. Lampkin booked flights on April 21, 2021 for himself and other codefendants from DTW to LAX. While in California, the defendants purchased methamphetamine and other drugs that they intended to transport back to Michigan for distribution.

On April 24, 2021, Bennett, Stockman, and Wade flew back together from LAX to DTW. Upon their return to DTW, 9.4 kilograms of

methamphetamine was seized from their luggage. Lampkin and Lockridge flew back together from LAX to DTW, separate from Bennett, Stockman, and Wade.

*Drug Distribution: Relevant Conduct*

Lampkin's relevant conduct, however, extended well beyond the April 21-24, 2021 weekend. Since at least 2019, Lampkin conspired to distribute drugs (PSR ¶¶ 16, 17, 19). He was in charge in Detroit and regularly received proceeds from drug sales in West Virginia (PSR ¶ 19). Lampkin's drug trafficking was not limited to methamphetamine. He also mixed heroin and fentanyl in Detroit, which was transported weekly to West Virginia for distribution (PSR ¶ 17). According to a confidential cooperating witness, pounds of Lampkin's heroin/fentanyl mixture were transported each week.

The methamphetamine seized on a weekend in April 2021 (9.4 kilograms) was just one of Lampkin's many purchases in California that he distributed (or intended to distribute) in West Virginia. Lampkin's normal procedure was to travel to California with others to spend \$32,000 to purchase approximately 7.3 kilograms (16 pounds) of methamphetamine (PSR ¶¶ 17, 19). The below chart, listing flights that

Lampkin purchased for coconspirators (as identified in the PSR), corroborates Lampkin's frequent drug trafficking trips.

### Exhibit 1:

Target Traveling	Date	Route	Paid by	E-mail contact (if any)
David R [REDACTED] and Robert Lampkin	2/13/2020	LAX-DTW	Robert Lampkin	<a href="mailto:Robertlampkin0322@gmail.com">Robertlampkin0322@gmail.com</a>
David R [REDACTED] and Robert Lampkin	2/25/2020 →2/27/2020	DTW-LAX	Robert Lampkin (Expedia)	
David R [REDACTED] Kennedy W [REDACTED], Dwayne W [REDACTED], and Robert Lampkin	3/23/2020→ 3/25/2020	DTW-LAX	Robert Lampkin (Expedia)	
David R [REDACTED] and Brenden Lockridge	4/6/2020	CRW→ LAX		
Brenden Lockridge	7/24/2020	LAX— staying at Holiday Inn Express		<a href="mailto:Robertlampkin0322@gmail.com">Robertlampkin0322@gmail.com</a>
Brenden Lockridge	7/27/2020	LAX→ DTW	Robert Lampkin (booked on Expedia)	<a href="mailto:Robertlampkin0322@gmail.com">Robertlampkin0322@gmail.com</a>
Brenden Lockridge	8/5/2020	DTW→ ATL→ LAS→ DTW	Robert Lampkin (booked on Expedia)	<a href="mailto:Robertlampkin0322@gmail.com">Robertlampkin0322@gmail.com</a>
Kevin G [REDACTED]	3/10/2020	DTW→ DFW→ ONT	Robert Lampkin (booked on Expedia)	<a href="mailto:Robertlampkin0322@gmail.com">Robertlampkin0322@gmail.com</a>
Kevin G [REDACTED]	3/27/2020	DTW→ DFW→ LAX	Robert Lampkin (booked on Expedia)	<a href="mailto:Robertlampkin0322@gmail.com">Robertlampkin0322@gmail.com</a>
Kevin G [REDACTED]	3/29/2020	CLT→ DTW	Robert Lampkin (booked on Expedia)	<a href="mailto:Robertlampkin0322@gmail.com">Robertlampkin0322@gmail.com</a>

Kevin G [REDACTED]	4/18/2020	LAX→ CLT	Robert Lampkin (booked on Expedia)	<a href="mailto:Robertlampkin0322@gmail.com">Robertlampkin0322@gmail.com</a>
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Lampkin's drug trafficking was also accompanied by firearms. On May 6, 2021, agents executing a search warrant at his residence seized two electronic scales with methamphetamine residue, cocaine, \$11,000 in a safe, seven cellular phones, \$710 in pants pockets, \$1,860 in a suitcase, and a loaded .38 special firearm (PSR ¶ 26). The below text messages, on February 18, 2021, between Lampkin and Lockridge, a drug coconspirator, referenced "guns."

## Exhibit 2:

02/18/2021	12:45:00	Incoming	Wya
02/18/2021	12:45:05	Incoming	Call me ASAP
02/18/2021	12:51:18	Incoming	I need you to pull up ASAP
02/18/2021	12:51:27	Incoming	It's about the one situation
02/18/2021	12:51:35	Incoming	We need to handle
02/18/2021	12:51:49	Incoming	Call me I need the guns
02/18/2021	12:52:03	Incoming	Questioned "Call me I need the guns "

The scale of Lampkin's drug trafficking conspiracy is also highlighted by the amount of cash that he and Lockridge exchanged in Las Vegas. In August and September 2020, they conducted multiple cash transactions at casino properties in Las Vegas, Nevada. On August 7, 2020, they cashed in \$159,344.00 and cashed out \$129,200.00. On August 8, 2020, they cashed in \$180,855.00 and cashed out \$303,000.00.

On August 10, 2020, they cashed in \$132,800.00 and cashed out \$120,000.00. Lastly, on September 7, 2020, they cashed in \$35,455.00 and cashed out \$12,000.00.

Lampkin frequently communicated with coconspirators about illegal activities in West Virginia, as highlighted in the below chat on Lockridge's phone incoming/outgoing from/to Lampkin on March 7, 2021.

### Exhibit 3:

Incoming	What the fuck we doing in west v lol
Outgoing	□□□□□ I'm damn near ready to tap back in□
Incoming	Shit me too just need a few more weeks make sure we ain't hot
Outgoing	Hell yeah it's on the fasho

Shortly before the April 21-24, 2021 weekend, Lampkin directed Lockridge to split up money among the three person when flying out to California to avoid detection by TSA, as highlighted in the below chat on Lockridge's phone incoming from Lampkin on April 19, 2021.

### Exhibit 4:

Incoming	Yo split the pape up between y'all so it's no issue getting threw tsa and text me when y'all board the plane I'm extra sleepy and gotta a million things to do
Incoming	Split the money up between the 3 of y'all and put it in a safe place collectively when y'all land I'll be there tomorrow night

During the April 21-24, 2021 weekend, while Lampkin was in California and before the seizure of methamphetamine that was “wrapped in clear tape and black plastic” (PSR ¶¶ 27-28), Lampkin and Lockridge communicated about a vacuum sealer, as highlighted in the below chat on Lockridge’s phone incoming/outgoing from/to Lampkin on April 22, 2021.

**Exhibit 5:**

Outgoing	Trev wanted to see you when you got here and I still gotta go to him to use the vacuum sealer
Outgoing	You got a rental???
Incoming	Sealer for what and we can't get it til the morning
Outgoing	This half P my brother leaving in the morning

During the April 21-24, 2021 weekend, while Lampkin was in California and before the methamphetamine was flown back to DTW, he and other coconspirators received a text, on April 24, 2021, complaining about couriers who were not fully engaged in the drug trafficking activities.

**Exhibit 6:**

Yo we needed you to fly the bag back that's the whole reason we was paying you the whole trip you been doing you which is cool but we had big business on the floor and couldn't have you around for a ride or nothing and now we have to figure out who can get the bag back

*Unemployment Insurance Fraud*

From on or about March 26, 2020 to on or about April 22, 2021, Lampkin conspired with Lockridge and others to commit wire fraud, which involved defrauding various state unemployment programs. On January 4, 2024, the government emailed Probation (and copied Lampkin's attorney and Lockridge's attorney) a letter detailing the \$2,143,875 that the conspirators obtained in aggregate from the Arizona, California, Michigan, Minnesota, and Texas unemployment programs. Because the defendants pled guilty to conspiracy to commit wire fraud, they are jointly and severally liable for the \$2,143,875 restitution.

Evidence of the conspiracy to commit wire fraud includes personal identifying information (PII) that was found on Lampkin's phone, primarily in the form of handwritten notebook pages. Evidence also includes the following chats among coconspirators on March 20, 2021 (discussing having the "info" to put in) and April 22, 2021 (discussing the type of info needed) that were found on conspirators' phones.



**Exhibit 7:**

██████ a make all that shit

Just have your info

We can sit with her at 5

And she a put niggas shit in

**Exhibit 8:**

Name  
DOB  
SS  
Address  
Business address  
Business name  
EIN  
Business start date  
Bank name  
Routing number  
Acct number  
Feb 2020 bank statement  
Phone number  
Email  
Front an back of ID  
This what I need

The \$2,143,875 mentioned above was calculated by a Special Agent of the U.S. Department of Labor (DOL) Office of Inspector General (OIG) who searched a federal government database to determine whether the PII found on conspirators' phones was used in a claim to any state unemployment agency and then adding other claims that shared features with those claims, such as the same IP address, email, or physical address.

## **II. Procedural History**

On July 7, 2021, Lampkin was arraigned on a single count Indictment charging him with violating 21 U.S.C. §§ 841 and 846, which carried a 10-year mandatory minimum sentence.

On August 3, 2023, Lampkin was arraigned on a two-count Fifth Superseding Information charging him with violating 21 U.S.C. §§ 841 and 846 (Count One), which carried a 10-year mandatory minimum sentence, and violating 18 U.S.C. § 1349 (Count Two).

On September 14, 2023, Lampkin pled guilty to both counts in the Fifth Superseding Information pursuant to a Rule 11 Plea Agreement.

## **III. Guideline Range**

Probation correctly calculated a guideline range of 324 to 405 months, based on a Total Offense Level of 41 and a Criminal History Category I. Count One carries a 120-months (10-years) mandatory minimum sentence.

The government moves for a downward departure and recommends a sentence of 204-months (17-years). Lampkin is not safety valve eligible.

#### **IV. Section 3553(a) Sentencing Factors**

The government's recommended sentence is based on the following sentencing factors.

***A. Nature and Circumstances of the Offense – 18 U.S.C. § 3553(a)(1)***

Methamphetamine is one of the most dangerous and addictive drugs in society. And the amount seized in this case – 9.4 kilograms – would have harmed a large number of addicts. The nature and circumstances of the offense weigh in favor of a heavy sentence.

However, Lampkin's relevant conduct is not limited to the methamphetamine seized on April 24, 2021. Since at least 2019, he conspired to distribute methamphetamine and heroin/fentanyl, routinely obtaining and transporting large quantities. As Probation appropriately notes, the April 2021 "trip was not isolated and was made several times by the defendant" (PSR ¶ 131).

And Lampkin was the leader. Struggling single parents, who he could entice with an expenses-paid trip to the west coast, and young aspiring rap artists were among those who worked underneath him. Probation appropriately scored Lampkin as the organizer or leader of a criminal activity that involved five or more participants or was

otherwise extensive (PSR ¶ 46). Evidence of Lampkin's role as the organizer and leader included purchasing flights for coconspirators, instructing coconspirators how to travel on flights with cash proceeds to avoid detection by TSA, and laundering drug proceeds in Las Vegas.

The nature and circumstances of Lampkin's offense also includes the unemployment insurance fraud that robbed states, and ultimately taxpayers, of a massive amount of money – \$2,143,875.

In isolation, or in aggregate, the counts in this case involved an offense that was serious and harmful to society.

***B. History and Characteristics of the Defendant – 18 U.S.C. § 3553(a)(1)***

Lampkin's criminal history is limited, but not insignificant. Early in his life, he received a break from the criminal justice system – HYTA – that should have been a wakeup call; however, he subsequently was convicted of another fraud offense (2006) and carrying a concealed weapon (2018) and then, since at least 2019, engaged in the relevant conduct in the instant offense. Furthermore, he didn't commit one offense, but two very harmful offenses – distributing methamphetamine (and heroin/fentanyl) and unemployment insurance fraud.

***C. Reflecting the Seriousness of the Offense, Promoting Respect for the Law, Providing Just Punishment for the Offense, and Affording Adequate Deterrence – 18 U.S.C. § 3553(a)(2)(A), (B)***

The charge in this case reflects Congress's opinion that certain defendants conspiring to distribute large quantities of dangerous drugs require a mandatory minimum sentence of at least 10 years. Just considering the methamphetamine seized from the April 2021 weekend, it is at least 180x the amount that triggers the largest mandatory minimum sentence in 21 U.S.C. § 841(b)(1)(A)(viii). Including all the methamphetamine and heroin/fentanyl that Lampkin conspired to distribute since at least 2019 would generate an even more staggering figure. The drug offense is undoubtedly serious. The unemployment insurance fraud is also serious given its size.

Lampkin's unabated conduct shows no respect for the law and shows his unwillingness to remain crime free.

***D. Protecting the Public from Further Crimes of the Defendant – 18 U.S.C. § 3553(a)(2)(C)***

Protecting the public from further crimes of the defendant is appropriate given Lampkin's role in both offenses. While he is detained, he will be unable to harm communities by distributing

methamphetamine and heroin/fentanyl and robbing taxpayers of government funds.

**V. Conclusion**

For the reasons described above, the government respectfully submits that a sentence of 204-months (17-years) is sufficient, but not greater than necessary, to achieve the purposes set forth in 18 U.S.C. § 3553(a)(2).

Respectfully submitted,

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Dated: January 17, 2024

**Certificate of Service**

I certify that on January 17, 2024, the foregoing paper was electronically filed with the Clerk of the Court of the Eastern District of Michigan using the ECF system, which will electronically serve all ECF participants.

/s/ Paul A. Kuebler

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